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A LIMITED LIABILITY LAW PARTNERSHIP LLP

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Attorney for Defendant
SULLIVAN PROPERTIES, INC.

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF HAWAII

SCOTTSDALE INSURANCE
COMPANY,

Plaintiff,

vs.

SULLIVAN PROPERTIES, INC.;
ROBERT B. SULLIVAN; MAUI
LAND & PINEAPPLE COMPANY,
INC.; AND KAPALUA LAND
COMPANY, LTD.,

Defendants.

CIVIL NO. CV04-00550 HG BMK
(Declaratory Relief)

DEFENDANT SULLIVAN
PROPERTIES, INC.'S **JOINDER**
IN DEFENDANT ROBERT B.
SULLIVAN'S **REPLY**
MEMORANDUM IN SUPPORT
OF MOTION TO CERTIFY
ISSUE TO THE HAWAII
SUPREME COURT, FILED
JANUARY 4, 2007 (filed 1/18/07);
CERTIFICATE OF SERVICE

Hearing: January 22, 2007

Time: 9:30 a.m.

Judge: Hon. Helen Gillmor

DEFENDANT SULLIVAN PROPERTIES, INC.'S
JOINDER IN DEFENDANT ROBERT B. SULLIVAN'S
REPLY MEMORANDUM IN SUPPORT OF MOTION TO
CERTIFY ISSUE TO THE HAWAII SUPREME COURT
FILED JANUARY 4, 2007 (filed 1/18/07)

Defendant SULLIVAN PROPERTIES, INC., by and through its attorneys, Goodsill Anderson Quinn & Stifel, A Limited Liability Law Partnership LLP, pursuant to Rule 7 of the Federal Rules of Civil Procedure, LR 7.4 and 7.9 of the Local Rules of Practice for the United States District Court for the District of Hawaii, hereby joins in Defendant Robert B. Sullivan's Reply Memorandum in Support of Motion to Certify Issue to the Hawaii Supreme Court filed herein on January 4, 2007, filed herein on January 18, 2007, and incorporates by reference the arguments raised and authorities cited therein.

DATED: Honolulu, Hawaii, January 19, 2007.

/s/ Roy J. Tjioe

ROY J. TJIOE

Attorney for Defendant

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CERTIFICATE OF SERVICE

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The undersigned hereby certifies that a copy of the foregoing
document was duly served upon the following parties, in the manner described
thereto, at their last-known addresses on the date indicated below:

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***Attorney for Defendants
MAUI LAND & PINEAPPLE
COMPANY, INC. and KAPALUA
LAND COMPANY, LTD.***

DATED: Honolulu, Hawaii, January 19, 2007.

/s/ Roy J. Tjioe

ROY J. TJIOE
Attorney for Defendant
SULLIVAN PROPERTIES, INC.